



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 19 2016

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Alan S. Armstrong, President and CEO
The Williams Companies, Inc.
One Williams Center
Tulsa, OK 74172

Re: Clean Air Act (CAA) Section 114(a) Information Request for The Williams Companies',
Inc. Pigging Operations

Dear Mr. Armstrong:

The United States Environmental Protection Agency (EPA) hereby requires The Williams Companies, Inc. (Williams) to provide certain information to determine the Clean Air Act (CAA or the Act) compliance status of its natural gas gathering facilities located in Ohio, West Virginia, and Pennsylvania.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. For the EPA to determine whether a violation of the CAA has occurred, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to Requests 1-3 herein, within thirty (30) calendar days from receipt of this request. Instructions and definitions are provided in Enclosure 1 and the information being requested is contained within Enclosure 2. For ease of organization, the EPA is providing an electronic copy of an excel spreadsheet in Enclosure 5 for the responses to Request 1.

You are required to attach a properly executed Statement of Certification (see Enclosure 3) to your response to this request. The statement must be signed and dated. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the Act and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the Act, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this request; 3) the initiation of a civil action pursuant to section 113(b) of the Act, 42

U.S.C. § 7413(b); and/or 4) any other action authorized under the Act. In addition, knowingly providing false information in response to this information request may be actionable under section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that emission data cannot be claimed as confidential under section 114(c). For detailed instructions, please see Enclosure 4 to this letter. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

For responses pertaining to sites located in EPA Region III, please submit the requested information to:

Mr. Bowen (Chip) Hosford
U.S. Environmental Protection Agency Region III
Office of Air Enforcement & Compliance Assurance
Mail code: 3AP20
1650 Arch Street
Philadelphia, PA 19103-2029

AND

Mr. Christopher Williams, P.E.
Stationary Source Enforcement Branch
Air Enforcement Division
U.S. Environmental Protection Agency
Mail Code: 2242A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

For responses pertaining to sites located in EPA Region V, please submit the requested information to:

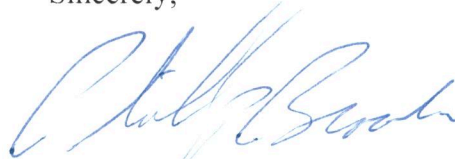
Mr. Constantinos (Kosta) Loukeris
U.S. Environmental Protection Agency Region V
Air Enforcement and Compliance Assurance
Mail code: AE-17J
77 West Jackson Blvd.
Chicago, IL 60604

AND

Mr. Christopher Williams, P.E.
Stationary Source Enforcement Branch
Air Enforcement Division
U.S. Environmental Protection Agency
Mail Code: 2242A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you have any questions regarding this Information Request, please contact Christopher Williams, at 202-564-7889, or your counsel may contact Kathryn Caballero, at 202-564-1849.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phillip A. Brooks".

Phillip A. Brooks, Director
Air Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Enclosures: 1) Instructions and Definitions
2) Information Requested
3) Statement of Certification
4) Confidential Business Information
5) Excel Worksheet for Responses to Request 2

cc: Doug Snyder, EPA Region III
Bowen (Chip) Hosford, EPA Region III
Mary McAuliffe, EPA Region V
Constantinos (Kosta) Loukeris, EPA Region V

ENCLOSURE 1

A. Instructions

1. The EPA is providing an excel worksheet as Enclosure 5 for ease of organization of responses to Request 1 and its subparts set forth in this Information Request. Please populate the worksheet with your responses to Request 1 and it's subparts in accordance with all instructions here and therein, and in the units noted.
2. With respect to Requests 2 and 3, please provide a separate narrative response to each request and subpart of each request set forth in this Information Request.
3. Except for the information specifically requested to be in an Excel spreadsheet format, Williams may choose to either submit documents in .pdf format or submit documents as hard copy documents. Electronic submissions are preferred to save paper and expenses.
4. If Williams has no responsive information or documents pertaining to a particular request, submit an affirmative statement and explanation.
5. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the request to which it corresponds. If a document is responsive to more than one request, this must be so indicated and only one copy of the document needs to be provided.
6. Provide all documents supporting your responses to this Information Request, such as performance test reports, inspection records, memorandums, facility records, permits, etc.
7. For each document provided in response to this Information Request, provide an accurate and legible copy submitted electronically, clearly label to which question(s) the data is responsive.
8. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner and the basis for the number provided (e.g., estimated, measured or engineering judgment).
9. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that either possesses or is likely to possess such documents or information.

B. Definitions

1. All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the Clean Air Act or its implementing regulations.

2. For purposes of this request Williams means The Williams Companies, Inc. and any subsidiaries, whether wholly or partially owned, or joint-ventures, or other business affiliations, including, but not limited to Williams Partners L.P., and Caiman Energy II, LLC.
3. “EPA Region III” is defined as the geographic area containing the States of Maryland, Delaware, and West Virginia, the Commonwealths of Virginia and Pennsylvania, and the District of Columbia.
4. “EPA Region V” is defined as the geographic area containing the States of Minnesota, Wisconsin, Illinois, Indiana, Michigan, and Ohio.
5. “Rich wet natural gas” is defined as natural gas with a composition of less than 95% methane by weight, or $< 95\% \text{ CH}_4$ by weight.
6. “Pigging” is the process of introducing a device into a natural gas pipeline to push condensed liquids through and out of the pipeline to reduce the system pressure drop, improve gas flow and pipeline efficiency, and collect natural gas liquids for processing.
7. “Blowdown” is the process of venting of raw or processed natural gas contained inside a pressure vessel, pipeline, or other equipment to the atmosphere.
8. “Pig launcher,” or “launcher,” is the pressure vessel and associated piping used to introduce a pig into a pipeline segment during pigging.
9. “Pig receiver,” or “receiver,” is the pressure vessel and associated piping used to remove a pig from a pipeline segment during pigging.

ENCLOSURE 2

Information Request

1. Please use the electronic excel worksheet in Enclosure 5 to respond to the following request; note the column listed in *italics* indicating where the information is to be input into the worksheet. Examples of completed entries to the provided worksheet is included at the end of Enclosure 2 in Table 2-1. Identify all Williams pig launchers and pig receivers installed on pipelines transporting rich wet natural gas in Ohio, West Virginia, and Pennsylvania; include the following information for each launcher and receiver.
 - a. An inventory number for referencing and cataloguing the information provided in the spreadsheet. *[Column A]*
 - b. The type of vessel, i.e. “launcher” or “receiver”. *[Column B]*
 - c. The Global Positioning System (GPS) coordinates (latitude and longitude) of the launcher or receiver. *[Column C]*
 - d. The name of the facility where the launcher or receiver is located and whether the facility is a standalone pigging station, gas compressor station, gas processing plant, well pad, or other facility; if other, please specify the type of facility. *[Column D]*
 - e. Name of the connecting facility; for each launcher, include the name of the downstream facility where the pig is received; and for each receiver, include the name of the upstream facility from where the pig is launched. *[Column E]*
 - f. The outer diameter (O.D.) of the pipeline connected to the launcher or receiver in inches (in). *[Column F]*
 - g. The operating pressure of the pipeline system connected to the launcher or receiver in pounds per square inch gage (psig). *[Column G]*
 - h. The temperature range of the gas flowing in the launcher or receiver in degrees Fahrenheit (°F). *[Column H]*
 - i. The yearly maximum pigging frequency in pigging events per year at each launcher or receiver. *[Column I]*
 - j. The total volume of the launcher or receiver in cubic feet (ft³). *[Column J]*
 - k. The volatile organic compound (VOC) composition of the gas stream flowing through the launcher or receiver in percent VOC by weight (%VOC by weight). *[Column K]*
 - l. If emissions from the launcher or receiver are controlled during pigging to reduce emissions from blowdown of the barrel to atmosphere, identify the type(s) of control in place (*e.g.*, vapor recovery unit, flare, pressure reduction before blowdown, etc.); and include any additional information, where appropriate. *[Column L]*
 - m. If the facility listed in 1.d has applied for and/or received a state, local and/or federal air permit, specify the type of permit and include the permit number or other reference. *[Column M]*

2. Provide all Williams Standard Operating Procedures (SOPs) that describe the unloading and handling of natural gas liquids that accumulate in the gathering pipelines including any onsite storage, disposal, or other operations performed.
3. Identify the person(s) (including name, title, and a description of job duties) that provided information that was used or considered in responding to a request, as well as each person (including name, title, and a description of job duties) who was consulted in the preparation of the response.

Table 2-1: Examples of Completed Entries to the Provided Worksheet for the Response to Request 1

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Index or Number	Asset Category	GPS Coordinates	Facility Name and Type	Name of Connecting Facility (i.e. Receives pig from Facility or Launches pig to Facility)	Pipeline O.D. Diameter (in.)	Pipeline Operating Pressure (psig)	Gas Temperature Range (°F)	Pigging Frequency (events per year)	Launcher or Receiver Volume (ft³)	% VOC by Weight Composition of Gas Stream	Emissions Control Description	If permitted, include Permit Type and Number or other reference
EXAMPLE-1	Launcher	38°53'35.71"N 77° 1'46.01"W	Murfield Rd. Pigging Station	Frederick Gas Proc. Plant	20	1100	50 - 100	728	16	15%	No Control	None
EXAMPLE-2	Receiver	38°53'35.71"N 77° 1'46.01"W	Murfield Rd. Pigging Station	Brown Compressor Station	20	1100	50 - 100	728	44	15%	No Control	None
EXAMPLE-3	Launcher	39°57'17.34"N 75°10'3.82"W	Brown Compressor Station	Murfield Rd. Pigging Station	20	1100	50 - 100	728	16	15%	Enclosed Flare	None
EXAMPLE-4	Receiver	39°57'17.34"N 75°10'3.82"W	Brown Compressor Station	Well Pad Z	16	150	50 - 100	208	16	23%	Vapor Recovery Unit	Synthetic Minor Permit, G780-80954
EXAMPLE-5	Receiver	39°57'17.34"N 75°10'3.82"W	Brown Compressor Station	Well Pad Y	16	150	50 - 100	208	16	23%	Vapor Recovery Unit	Synthetic Minor Permit, G780-80954

ENCLOSURE 3

Statement of Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Printed Name)

(Title)

(Date)

ENCLOSURE 4

Confidential Business Information (CBI) **Assertion and Substantiation Requirements**

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in response to this information request, as provided in 40 C.F.R. Section 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to the EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as “trade secret” or “proprietary” or “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. If you desire confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state. Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

B. Substantiation Requirements

All confidentiality claims are subject to the EPA verification in accordance with 40 C.F.R. Part 2, subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. Sections 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business’s competitive edge.

Pursuant to 40 C.F.R. Part 2, subpart B, the EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide the EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information. If you receive such a letter, the EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible, in accordance with 40 C.F.R. 2.204(e):

1. What specific portions of the information are alleged to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. Section 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B.

Emission data means, with reference to any source of emission of any substance into the air:

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

(C) A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. Sections 2.301(a)(2)(i)(A), (B) and (C).

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.